

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ORCA SECURITY LTD.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 23-758 (JLH)
)	
WIZ, INC.,)	
)	
Defendant.)	

JOINT MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTES

Plaintiff Orca Security Ltd. and Defendant Wiz, Inc. respectfully move this Court to schedule a teleconference to address outstanding disputes regarding the following discovery matters.

Plaintiff Orca Security Ltd.'s Issues For Teleconference:

1. Defendants' responses to Plaintiff's Interrogatory Nos. 1, 2, 6, 7, and 12, including Defendants' withholding of relevant source code and git history.
2. Defendants' responses to Plaintiffs' Second Set of Requests for Production (Nos. 84-90).
3. Wiz's incomplete production of relevant JIRA documents.

Defendant Wiz, Inc.'s Issues For Teleconference:

1. Plaintiff's responses to Defendant's Interrogatory Nos. 2 and 4.
2. Plaintiff's response to Defendant's RFP No. 54.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in one or more verbal meet-and-confers by telephone on the following dates: May 21, 2024, May 23, 2024, and June 3, 2024.

Delaware Counsel:

- Orca: Rodger Smith and Cameron Clark (Morris, Nichols, Arshat & Tunnell);
- Wiz: Christine Haynes and Fred Cottrell (Richards, Layton & Finger)

Lead Counsel:

- Orca: Blake Davis, Chris Henry, Krissy McKenna, Lucas Lonergan, and Peter Hoffman (Latham & Watkins);
- Wiz: Caty Lacey and Praatika Prasad (Wilson Sonsini)

The parties are available for a teleconference on the following dates: July 11, July 16, or July 17 after 1:00 pm ET.

MORRIS, NICHOLS, ARSHAT & TUNNELL LLP

/s/ Rodger D. Smith II

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July 2, 2024

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